

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROHAN RAMCHANDANI,

Plaintiff,

v.

CITIGROUP, INC., CITICORP, and CITIBANK,  
N.A.,

Defendants.

No. 1:19-cv-9124 (VM) (SDA)

**STIPULATION CONCERNING THE FILING OF  
PORTIONS OF DOCUMENTS AS EXHIBITS IN CONNECTION WITH  
DEFENDANTS' REPLY IN FURTHER SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Rohan Ramchandani and Defendants Citigroup Inc., Citicorp, and Citibank, N.A. (collectively, "Citi") (together, the "Parties") stipulate, pursuant to Section II.E.2 of the Court's Individual Practices that, with regard to the following identified portions of excerpted transcripts, filed as exhibits to the Supplemental Declaration of Marshall H. Fishman, that the Parties are: (1) familiar with the full contents of such transcripts; (2) possess and each will maintain a copy of such entire transcripts in their respective case files until after a final court disposition of this action; and (3) that the excerpted transcripts are authentic copies:

- Deposition transcript of Rohan Ramchandani taken on April 26, 2022;
- Deposition transcript of James Forese taken on August 3, 2022;
- Deposition transcript of Jeffrey Feig taken on July 14, 2022;
- Deposition transcript of Francisco Fernandez de Ybarra taken on July 15, 2022;
- Deposition transcript of Jonathan Kolodner taken on July 13, 2022;
- Deposition transcript of Danielle Romero-Apsilos taken on July 11, 2022;
- Deposition transcript of the Department of Justice ("DOJ") representative, Carrie Syme taken on April 4, 2022.

- Publicly-available ECF transcripts filed in *United States v. Usher et al.*, 17 Cr. 19 (RMB) (S.D.N.Y.);
- Transcript of Grand Jury proceedings transcribed on May 5, 2016 and annexed to the April 4, 2022 DOJ deposition Transcript at Exhibit 17;

Dated: February 22, 2023  
New York, New York

**GOODWIN PROCTER LLP**

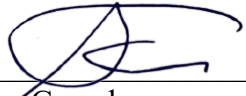
By: /s/ Marshall H. Fishman  
Marshall H. Fishman  
Samuel J. Rubin  
Elizabeth M. Zito  
Lindsay E. Hoyle  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
Tel. (212) 813-8800  
Fax (212) 355-3333  
mfishman@goodwinlaw.com

*Attorneys for Defendants Citigroup Inc.,  
Citicorp, and Citibank, N.A.*

**LAW OFFICE OF DAVID R. LURIE, PLLC**

194 President Street  
Brooklyn, New York 11231  
Telephone: (347) 651-0194  
david@davidlurielaw.com

**LAW OFFICE OF GARY GREENBERG,  
ESQ.**

By:   
Gary Greenberg  
99 Hudson Street, 5<sup>th</sup> Floor  
New York, NY 10013  
Telephone: (212) 765-5770  
gg@greenberglaw.com

*Counsel for Plaintiff*

SO ORDERED \_\_\_\_\_ DATE:  
Judge Victor Marrero